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2 The Honorable Marsha J. Pechman
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 DUSTIN DEAN,

11 Plaintiff,

12 v.

13 CITY OF TACOMA, TIMOTHY RANKINE,
14 and MASYIH FORD,

15 Defendants.

No. 3:21-cv-05822-MJP

DECLARATION OF
MATTHEW A. ERICKSEN, SR.

16 I, Matthew A. Ericksen, Sr., declare and states as follows:

- 17 1. I am over the age of 18 years. I am one of the attorneys representing Plaintiff Dustin
18 Dean in the above-styled civil action. I am competent to make this Declaration and
19 I make it based on my own personal knowledge.
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21 2. Plaintiff was deposed in this matter on January 10, 2025. Attached hereto as Exhibit
22 A is a true and accurate excerpt from Plaintiff's deposition.
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24 3. Defendant Timothy Rankine was deposed in this matter on January 7, 2025.
25 Attached hereto as Exhibit B is a true and accurate excerpt from Rankine's
26 deposition.
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1 4. Defendant Masyih Ford was deposed in this matter on January 16, 2025. Attached
2 hereto as Exhibit C is a true and accurate excerpt from Ford's deposition.

3 5. Tacoma Police Department Sergeant Todd Kitselman was deposed in this matter
4 on January 16, 2025. Attached hereto as Exhibit D is a true and accurate excerpt
5 from Kitselman's deposition.
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7 6. Plaintiff's police practices expert James Pugel was deposed in this matter on
8 February 18, 2025. Attached hereto as Exhibit E is a true and accurate excerpt from
9 Pugel's deposition.

10 7. Attached hereto as Exhibit F is a true and accurate copy of Rankine's police report.

11 8. Attached hereto as Exhibit G is a true and accurate copy of Vanessa Ray's affidavit.
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13 I declare under penalty of perjury under the laws of the United States of America and the
14 State of Washington that the foregoing is true and correct.

15 Executed this 11th day of March, 2025.

16
17 /s/ Matthew A. Ericksen, Sr.
18 MATTHEW A. ERICKSEN, SR.
19 Georgia Bar No. 304088
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